

**EXHIBIT A**

**SUMMARY OF FEES BY CATEGORY FOR  
JANUARY 2015**

<b>Category</b>	<b>Hours</b>	<b>Fees</b>
General Administration	22.0	\$17,218.50
Monthly Reports	0.3	\$76.50
Insurance	37.2	\$22,794.50
Creditors' Committee	3.1	\$2,480.00
Miscellaneous Motions and Adversary Proceedings	3.2	\$1,684.50
Retention of Professionals and Fee Applications	5.6	\$3,063.00
<b>Total</b>	71.4	\$47,317.00

**SUMMARY OF EXPENSES**

<b>Description</b>	<b>Amount</b>
Pacer Research	\$188.00
<b>Total</b>	\$188.00



Mark E. Freedlander  
412.667.7928

EQT plaza 23rd and 27th Floor  
625 Liberty Avenue  
Pittsburgh PA 15222-3142

March 24, 2015

INVOICE NO. 91747278

Freedom Industries, Inc.  
1015 Barlow Drive  
Charleston, WV 25311

TAX ID NO. 54-0505857

JOINT GROUP #2067060

Current Invoice:

Current Fees:	\$47,317.00	
Current Disbursements:	<u>\$188.00</u>	
Current Invoice Total:		<u>\$47,505.00</u>

PLEASE REMIT PAYMENT TO THE FOLLOWING ADDRESS:

McGuireWoods LLP  
Attn: Accounts Receivable  
901 E. Cary Street  
Richmond, VA 23219-4030

# McGUIRE WOODS

For professional services rendered and expenses incurred from  
January 5, 2015 through January 31, 2015 regarding File  
Number 2067060 :

<u>Matter</u>	<u>Fees</u>	<u>Disb.</u>	<u>Total</u>
General Administration			
2067060-0001	\$17,218.50	\$188.00	\$17,406.50
Monthly Reports			
2067060-0005	\$76.50	\$0.00	\$76.50
Disclosure Statement and Plan of Reorganization			
Insurance			
2067060-0014	\$22,794.50	\$0.00	\$22,794.50
Creditors' Committee			
2067060-0017	\$2,480.00	\$0.00	\$2,480.00
Miscellaneous Motions and Adversary Proceedings			
2067060-0019	\$1,684.50	\$0.00	\$1,684.50
Sales			
Retention of Professionals and Fee Applications			
2067060-0022	\$3,063.00	\$0.00	\$3,063.00
	\$47,317.00	\$188.00	\$47,505.00

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FOR PROFESSIONAL SERVICES RENDERED AND EXPENSES INCURRED:

**Re: General Administration**

**Our File No. 2067060-0001**

**For Services Rendered Through Jan 31, 2015**

01/05/15 Status/strategy discussion with M. Welch Mark E. Freedlander	1.00
01/05/15 Address AIG and class action settlement matters with A. Majestro Mark E. Freedlander	.50
01/05/15 Address voluntary remediation program matters with A. Blakenship and ARCADIS Mark E. Freedlander	.60
01/05/15 Status update discussion with D. Bissett Mark E. Freedlander	.40
01/05/15 Emails regarding status report in District Court; email to local counsel for filing Susan D. Harding	.20
01/06/15 Address matters relating to VRP with M. Welch, A. Blakenship Mark E. Freedlander	1.00
01/06/15 Address Diversified matters with M. Welch Mark E. Freedlander	.80
01/06/15 Draft preliminary version of environmental status report Mark E. Freedlander	1.40
01/07/15 Draft revisions to environmental status report Mark E. Freedlander	1.00
01/07/15 Address Etowah stolen floating barge issues with A. Blakenship Mark E. Freedlander	.90
01/08/15 Address WVDEP demand for trailer clean up with A. Blakenship - review Lexycon documents for listing of vehicles at issue with WVDEP Mark E. Freedlander	1.30

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01/08/15	Review A. Blankenship comments to environmental status report and revise status report accordingly; follow up discussion with A. Blankenship regarding same Mark E. Freedlander	1.30
01/09/15	Revise environmental status report, follow up communications with M. Welch and A. Blakenship regarding same Mark E. Freedlander	1.20
01/09/15	Address floating dock issues with M. Welch Mark E. Freedlander	.50
01/12/15	Comprehensive status/strategy update discussion with M. Welch Mark E. Freedlander	1.20
01/12/15	Address Welch comments to environmental status report, revise and finalize same Mark E. Freedlander	.50
01/12/15	File environmental status report Susan D. Harding	.20
01/14/15	Case status/strategy communications with M. Welch, address case disposition matters with R. Gold and A. Majestro Mark E. Freedlander	1.50
01/14/15	Address G. Southern document request with counsel to W. Tis and M. Welch Mark E. Freedlander	.80
01/15/15	Conference call with J. Manzo regarding matters relating to ending of environmental clean up Mark E. Freedlander	.70
01/19/15	Status/strategy communications with M. Welch Mark E. Freedlander	.50
01/20/15	Case status/strategy discussion with M. Welch Mark E. Freedlander	.50
01/20/15	Organize and file response to Southern objection to modified settlement agreement Susan D. Harding	.30
01/21/15	Status/strategy update discussion with CEB and RBK, follow up discussion with M. Welch Mark E. Freedlander	1.00

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01/23/15 Address Diversified matters with J. Fitzgerald	.70
Mark E. Freedlander	
01/23/15 Address Freedom plea matters with R. Leight	.50
Mark E. Freedlander	
01/26/15 Status update communications with M. Wlech	.70
Mark E. Freedlander	
01/28/15 Status/strategy communications with M. Welch	.80
regarding environmental matters and case disposition	
Mark E. Freedlander	

<u>Timekeeper</u>	<u>Rate/HR</u>	<u>Hours</u>	<u>Fees</u>
Mark E. Freedlander	\$800.00	21.3	\$17,040.00
Susan D. Harding	\$255.00	0.7	\$178.50
TOTAL FEES		22.0	\$17,218.50

Disbursements and Other Expenses:

Pacer Research	\$188.00
TOTAL EXPENSES	\$188.00

TOTAL FOR MATTER 2067060-0001	\$17,406.50
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Re: Monthly Reports

Our File No. 2067060-0005

For Services Rendered Through Jan 31, 2015

01/06/15 File November monthly operating report  
Susan D. Harding

.30

<u>Timekeeper</u>	<u>Rate/HR</u>	<u>Hours</u>	<u>Fees</u>
Susan D. Harding	\$255.00	0.3	\$76.50
		<u>0.3</u>	<u>\$76.50</u>
TOTAL FEES			

TOTAL FOR MATTER 2067060-0005

\$76.50

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**Re: Insurance**

**Our File No. 2067060-0014**

**For Services Rendered Through Jan 31, 2015**

01/08/15	Analysis of materials related to Southern's objection to settlement based on impact on his rights under Freedom Industry's policy Lowndes Christopher Quinlan	2.70
01/08/15	Telephone conference with S. Schuster regarding insurance issues related to settlement Lowndes Christopher Quinlan	.50
01/09/15	Discussions with counsel to AIG regarding potential approach to resolve G. Southern objection and discuss same internally with S. Schuster, status/strategy update with M. Welch regarding same Mark E. Freedlander	1.70
01/09/15	Analysis of Southern's claims disputing insurer's right to settle for less than all insureds Lowndes Christopher Quinlan	1.90
01/12/15	Evaluate the objections filed by G. Southern and research regarding potential responses based upon terms of the AIG policies and case law regarding settlement with one insured exhausting limits leaving other insureds with no defense or indemnity Stephen David Allred	1.30
01/12/15	Prepare email to S. Schuster setting forth observations and conclusions regarding Southern's objections and potential responses based upon research and AIG policy terms Stephen David Allred	1.30
01/12/15	Research for additional cases touching on an insurer's ability to settle for less than all insureds Lowndes Christopher Quinlan	2.30



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01/13/15	Continue researching case law regarding Southern's objections and work on preparing portion of response brief related to Southern's objections to settlement with AIG based upon terms of the policy and case law related to settling for one insured when there are multiple insureds and insufficient limits Stephen David Allred	2.00
01/13/15	Work on memorandum describing the right of an insurer to enter a settlement on behalf of less than all the insureds Lowndes Christopher Quinlan	2.30
01/13/15	Research regarding issues raised in Southern objection to settlement agreement Scott E. Schuster	1.20
01/13/15	Drafting brief in response to Southern objection to settlement agreement Scott E. Schuster	2.50
01/14/15	Status/strategy update communications with D. Lutz (Committee Counsel) Mark E. Freedlander	.40
01/14/15	Multiple communications with counsel to G. Southern regarding potential resolution of AIG objection; follow up with A. Majestro regarding same Mark E. Freedlander	1.00
01/14/15	Revise section of brief related to G. Southern's objection concerning policy terms and case law permitting settlement with one insured and email to S. Schuster regarding same Stephen David Allred	1.80
01/14/15	Continue drafting brief in response to Southern objection to settlement agreement Scott E. Schuster	3.00
01/14/15	Edit and revise brief in response to Southern objection to settlement agreement Scott E. Schuster	2.00
01/15/15	Review draft brief in support of revised AIG settlement and extensively revise brief in support; communications with S. Schuster regarding same Mark E. Freedlander	3.00

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01/16/15	Drafting of revisions to brief in support of revised AIG settlement, discussions with M. Welch, counsel to AIG regarding same Mark E. Freedlander	3.00
01/19/15	Drafting of revisions to brief in support of revised AIG settlement, communications with D. Timmins regarding same Mark E. Freedlander	1.50
01/20/15	Finalize brief in support of revised AIG settlement Mark E. Freedlander	1.00
01/28/15	Review of G. Southern reply papers and communications with M. Welch regarding same Mark E. Freedlander	.80

Timekeeper	Rate/HR	Hours	Fees
Mark E. Freedlander	\$800.00	12.4	\$9,920.00
Scott E. Schuster	\$525.00	8.7	\$4,567.50
Stephen David Allred	\$525.00	6.4	\$3,360.00
Lowndes Christopher Quinlan	\$510.00	9.7	\$4,947.00
	TOTAL FEES	37.2	\$22,794.50

TOTAL FOR MATTER 2067060-0014

\$22,794.50

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Re: Creditors' Committee

Our File No. 2067060-0017

For Services Rendered Through Jan 31, 2015

01/13/15 Case status/strategy - disposition discussion 2.50  
with R. Gold and A. Majestro; update discussion  
with M. Welch regarding same; follow up  
memorandum to R. Gold and A. Majestro regarding  
issues and estate position on case disposition  
Mark E. Freedlander

01/22/15 Communications with R. Gold regarding committee .60  
position on case disposition  
Mark E. Freedlander

Timekeeper	Rate/HR	Hours	Fees
Mark E. Freedlander	\$800.00	3.1	\$2,480.00
		<hr/>	<hr/>
	TOTAL FEES	3.1	\$2,480.00

TOTAL FOR MATTER 2067060-0017 \$2,480.00

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\$1,684.50

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**Re: Retention of Professionals and Fee Applications**

**Our File No. 2067060-0022**

**For Services Rendered Through Jan 31, 2015**

01/07/15 Review and draft proposed revisions to CRO November 2014 fee report Mark E. Freedlander	1.00
01/07/15 File CRO certification of fees for November Susan D. Harding	.30
01/13/15 Draft tenth monthly fee statement for McGuireWoods Susan D. Harding	1.40
01/14/15 Address tax returns and involvement of Schneider Downs with M. Welch Mark E. Freedlander	1.00
01/16/15 Organize exhibits and file December monthly fee statement Susan D. Harding	.60
01/22/15 Review and draft modifications to CRO December fee reportion Mark E. Freedlander	1.00
01/22/15 Receive and file CRO report of professional services for December Susan D. Harding	.30

Timekeeper	Rate/HR	Hours	Fees
Mark E. Freedlander	\$800.00	3.0	\$2,400.00
Susan D. Harding	\$255.00	2.6	\$663.00
TOTAL FEES		5.6	\$3,063.00

TOTAL FOR MATTER 2067060-0022

\$3,063.00

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Summary of Fees and Expenses:

Total Fees for all Matters: \$47,317.00

Total Expenses for all Matters: \$188.00

Total for this Invoice: \$47,505.00